

Congress of the United States
House of Representatives
Washington, DC 20515-3302

January 10, 2023

Bridgette Duplantis
Project Coordinator
Bureau of Ocean Energy Management
Office of Leasing and Plans
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Comments On The Announced Eight Draft Wind Energy Areas In The Central Atlantic
(Docket NO: BOEM-2022-0072)

Dear Ms. Duplantis,

As members of the North Carolina delegation, we urge the Bureau of Ocean Energy Management (BOEM), Department of Defense (DoD), United States Coast Guard (USCG), and National Oceanographic and Atmospheric Administration (NOAA) to work together to maximize the acreage available for fixed-bottom offshore wind development in the Central Atlantic, facilitate regular and proactive stakeholder engagement across various ocean users, clarify and communicate potential visual impacts to relevant constituencies, and encourage site assessment practices that enhance data collection for future offshore wind energy facility siting.

The North Carolina delegation commends BOEM's decision to move forward with additional areas in the Central Atlantic region to further study them for potential leasing and encourages BOEM to consider the comments herein. We urge BOEM to be appropriately expeditious throughout this process and to ultimately prioritize areas that support the immediate needs and recognize constraints of impacted states, constituencies, and developers.

We are at a pivotal moment in our country's efforts to both combat the effects of climate change and to support the burgeoning offshore wind industry—a technology that will play an integral role in that fight. Federal goals of deploying 30-gigawatts (GW) of offshore wind energy by 2030 will unlock the economic and environmental benefits offshore wind stands to provide—including more than 44,000 well-paying jobs, nearly \$12 billion per year in capital investment, and the elimination of 78 million metric tons of CO₂ emissions from the atmosphere.¹

North Carolina has demonstrated significant leadership through the enactment of House Bill 951, which set a goal of net zero emissions by 2050.² Duke Energy's transition to renewables, codified through HB 951, will almost certainly require offshore wind energy. Additionally, the state is home to over 30 land-based

¹ The White House (2021, March 29) *Biden Administration Jumpstarts Offshore Wind Energy Projects to Create Jobs*. <https://www.whitehouse.gov/briefing-room/statements-releases/2021/03/29/fact-sheet-biden-administration-jumpstarts-offshore-wind-energy-projects-to-create-jobs/>

² *Energy Solutions for North Carolina*, H. bill 951, N.C.G.A. (2021-2022). <https://ncleg.gov/BillLookup/2021/h951>

wind manufacturers that are well-positioned and excited to expand into the offshore industry.³ In order to realize the tens of thousands of jobs and billions in new economic development and to reach the goals set by Governor Cooper's Executive Order 218, Duke Energy, and HB 951, North Carolina requires BOEM to advance announced draft WEAs and prioritize the addition of new areas viable for fixed-bottom structure turbines in the Central Atlantic.

Additionally, North Carolina has the strongest manufacturing workforce in the Southeastern United States.⁴ According to the Southeastern Wind Coalition's Industry Supply Chain database and map, North Carolina currently has 118 registered offshore wind supply chain companies, 55 of which already exist in the land-based wind supply chain. Undeveloped land on Radio Island at the Port of Morehead City offers a potential facility for manufacturing and staging of Tier 1 and Tier 2 offshore wind components. In order to create market certainty and encourage public-private partnerships to develop offshore wind infrastructure, a pipeline of projects along North Carolina's coast and beyond is necessary. By leveraging lease areas in the Central Atlantic, offshore wind has the potential to build upon North Carolina's manufacturing strengths and nation-leading economic conditions for component manufacturing to supply the offshore wind market along the East Coast and beyond.⁵

The North Carolina delegation respectfully provides the following comments to inform BOEM's efforts in identifying viable wind energy areas in the Central Atlantic and to advance the offshore wind industry in the Carolinas and the Southeast:

Prioritize viable fixed-bottom locations in lease areas C and D

Legislation passed in the 2021 session of the North Carolina General Assembly requires that the state's electric public utilities achieve 70% reduction in carbon emissions from 2005 levels by 2030 and carbon neutrality by 2050 in a least cost manner.⁶ While offshore wind is essential to meeting these goals, it is imperative that projects be developed as cost-effectively as possible to both compete with other generation sources as prescribed in the legislation, and ensure timely development to achieve national deployment goals of 30 GW by 2030. To that end, the North Carolina delegation recommends that BOEM prioritize the entry of lease areas viable for fixed-bottom structure turbines, specifically in wind energy areas C and D. While offshore wind is anticipated to be cost competitive with traditional generation technologies by 2030, the year by which North Carolina has committed to generating 2.8 GW of offshore wind, analysis has shown that fixed-bottom substructures are about 57% of the cost of floating substructures.⁷ Early access to lease areas compatible with fixed-bottom turbines is essential to establishing offshore wind as an economically viable energy source while the technology surrounding floating offshore wind develops. (We also support BOEM fully leasing the draft WEAs in deep water for floating offshore wind development in order to help meet the White House's goal of 15 GW of floating wind deployed by 2035. However, we note that floating wind has a distinct supply chain and longer development timeline, and these areas are not substitutes for fixed-bottom acreage.)

³ Available at https://www.sewind.org/images/fact_sheets/NorthCarolinaFactSheet.pdf.

⁴ Available at https://www.sewind.org/images/fact_sheets/NorthCarolinaFactSheet.pdf.

⁵ Available at <https://www.commerce.nc.gov/media/3640/open>

⁶ *Energy Solutions for North Carolina*, H. bill 951.

⁷ National Renewable Energy Lab (2019). 2019 Cost of Wind Energy Review. <https://www.nrel.gov/docs/fy21osti/78471.pdf>

Engage in regular and proactive stakeholder engagement across various ocean users in the Carolinas and Central Atlantic coast

Significant amounts of abundant, reliable, cost-effective offshore wind will need to be deployed in the coming years in order to reach national, state, and regional utility decarbonization goals. We recognize that parts of these WEAs have existing use conflicts, including those managed by DOD, USCG, and NOAA. We deeply appreciate that maintaining national security, ensuring navigational safety, and managing our commercial fisheries are critically important priorities. To ensure that the regulatory process continues to move forward in a transparent, inclusive, and time-sensitive manner and remains informed by the latest science and data, the North Carolina delegation encourages BOEM to engage in regular communication with and solicit feedback from various stakeholders that may be impacted by offshore wind development. Some key stakeholder groups are as follows:

1. The United States Department of Defense (DoD) operates significant training operations off the coast of Virginia and North Carolina. While these efforts are critical to national security, a clean, homegrown source of renewable energy like offshore wind provides an additional layer of national security and energy independence that can protect us in times of crisis. However, if we do not prioritize and procure access to lease areas viable for fixed-bottom structures early in the development of the United States' offshore wind market, we cannot build the economies of scale needed to reach economic development and national or state decarbonization goals. Because this round did not include input from the DoD, we implore BOEM to coordinate and examine every viable possibility for collocated activities using technical mitigations, prescribed flight and/or surface corridors, and limited curtailment for test activities that require electromagnetically quiet environments. Additional measures may include rerunning the NCCOS model once DoD weighs in so that it can recalibrate and offset any areas taken off the table due to DoD conflict.
2. The United States Coast Guard (USCG) has several equities tied to offshore renewable energy leasing opportunities. The Coast Guard's responsibilities include Marine Transportation System (MTS) infrastructure protection, emergency management, navigation safety, and maritime security. All these factors must be considered early in the process as BOEM considers lease areas in the Central Atlantic. The offshore wind industry supports these overlapping activities by employing responsible, effective mitigation measures to alleviate some of the Coast Guard navigational safety concerns. Offshore wind farms have several characteristics that reduce the risk to marine navigation: turbines are constructed in a regular, grid-like pattern; spaced far apart, generally more than half nautical mile from one another, to minimize the wake effect of wind turbines on one another; and are installed on relatively narrow towers, approximately 5 to 10 meters in diameter, so that vessels will be aware of the presence of one another. These characteristics collectively contribute to an overall low collision risk. As the leasing process of draft WEAs moves forward, the North Carolina delegation encourages BOEM to work closely with the Coast Guard to ensure successful co-existence of ocean users, specifically around safe vessel navigation.
3. We appreciate that BOEM has avoided the most-fished areas in the Central Atlantic in creating the Call Areas. However, to ensure that the regulatory process continues to move forward in a transparent, inclusive, and time-sensitive manner and remains informed by the latest science and data, the North Carolina delegation encourages BOEM to engage in regular communication with and solicit feedback from various fisheries stakeholders that may be impacted by offshore wind development. As has been the case with the lease areas off the coast of the Carolinas, there may be periods of time with little

regulatory progress and the existence of continued engagement, both led by or in concert with BOEM, that can help to maintain a steady stream of information-sharing and awareness to expedite the regulatory progress as it arises. Additionally, these stakeholder forums will prove essential as the industry begins to contemplate novel matters such as offshore transmission expansion.

Clarify and communicate potential visual impacts to relevant constituencies

In January of 2021, the Southeastern Wind Coalition coordinated with the British Consulate in Atlanta and UNASYS to commission visual simulations of the Wilmington East Wind Energy Area. The simulations and accompanying study concluded that wind turbine generators (WTGs) would be minimally visible even under ideal weather conditions at approximately 17 nautical miles from shore, quelling the concerns of many coastal stakeholders and North Carolina lawmakers as well as providing invaluable assets in stakeholder engagement efforts.⁸ The North Carolina delegation urges BOEM to provide visual simulations for each of the lease areas so that the relevant constituencies can better understand their impact. Call Area A, the closest to shore, begins 20 nautical miles off the coast of Delaware and Maryland. At this distance, a minimal visual impact can reasonably be expected. Call areas D and F to the South, parallel to the North Carolina and Virginia border, are even further out at 24 and 44 nautical miles respectively. Additionally, Call Area D is adjacent to the already leased Kitty Hawk WEA, allowing existing commissioned visualization reports from Kitty Hawk to offer additional insight into what is almost certainly a similarly limited visual or aesthetic impact from offshore wind infrastructure.

Encourage site assessment practices that enhance data collection for future offshore wind energy facility siting

As the Carolinas continue to make progress towards developing an offshore wind industry, the consistent gathering of relevant science and data will be critical for a streamlined, timely, and transparent regulatory process. The North Carolina delegation recommends BOEM make a concerted effort to compile and share marine data submitted by leasees of all Carolina WEAs to create a more robust and efficient leasing and development program in the Carolinas.

Conclusion

We appreciate BOEM's diligence in efficiently and mindfully advancing the regulatory process to introduce additional WEAs in the region. The North Carolina delegation reiterates the need to expand offshore wind's benefits to coasts outside of the Northeast, as the Southeast and the Carolinas stand ready to manufacture, construct, and operate the next wave of offshore wind projects that will provide family-sustaining wages to our communities and carbon-free energy to our region. We urge BOEM to consider the recommendations outlined in these comments to ensure that future WEAs advance cost-effectively, provide maximum benefit to states and impacted constituencies, and set the stage for continued growth across the Southeast.

⁸ Available at <https://www.sewind.org/resources/visualizations/31>

Sincerely,

A handwritten signature in black ink, appearing to read "Deborah K. Ross".

Deborah K. Ross
Member of Congress

A handwritten signature in black ink, appearing to read "Alma S. Adams".

Alma S. Adams, Ph.D.
Member of Congress

A handwritten signature in blue ink, appearing to read "Kathy Manning".

Kathy Manning
Member of Congress

A handwritten signature in black ink, appearing to read "Wiley Nickel".

Wiley Nickel
Member of Congress

A handwritten signature in black ink, appearing to read "Valerie Foushee".

Valerie Foushee
Member of Congress